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October 25, 2019

**VIA ECF**

The Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 11D  
New York, NY 10007  
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**Re: Ernestine Grant v. The New York Times Company, et al., No. 16 Civ. 03175  
(PKC)(DCF)**

Dear Judge Castel:

We represent the Defendants in this action, The New York Times Company ("The Times"), Mark Thompson, and Meredith Levien. The next case management conference is scheduled to take place on December 4 at 11:15 am.

We write in brief reply to Plaintiffs' opposition letter of last evening. We do not recall any comment from the Court at the last conference that no further extensions would be permitted, and in fact the Court granted the last two-week extension (Dkt. 142) without comment.

We recognize the age of the case and have no interest in prolonging its resolution unnecessarily. The mediation effort took longer than expected. The current request merely seeks to permit the completion of eleven depositions on a reasonable schedule, rather than virtually every day between October 30 and November 14.

We thank Your Honor for the Court's consideration of this request.

Respectfully submitted,

/s/ Mark W. Batten

Mark W. Batten

cc: Larissa Boz, Esq.  
Lawrence Pearson, Esq.  
Hilary Orzick, Esq.